



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**SEP 28 2016**

**CERTIFIED MAIL 7009 1680 0000 7642 3137**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF

Chief Warrant Officer Brian Hall  
Engineer Officer and Environmental Compliance Officer  
U.S. Coast Guard Detroit  
110 Mount Elliott Street  
Detroit, Michigan 48207

Re: Request for Information  
U.S. Coast Guard, Detroit, Michigan  
MI2 690 308 471

Dear Mr. Hall:

The U.S. Environmental Protection Agency is requesting information pursuant to section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927. RCRA section 3007 authorizes the Administrator of EPA (Administrator) to require the U.S. Coast Guard Detroit to submit certain information, and this authority is delegated to the Director of the Land and Chemicals Division, Region 5.

This request requires U.S. Coast Guard Detroit (USCG Detroit), to submit information relating to waste management at its facility located in Detroit, Michigan (Facility). EPA requires this information to determine the Facility's compliance with RCRA, and the regulations promulgated thereunder. Attachment 1 specifies the information USCG Detroit must submit. USCG Detroit must submit this information within 30 calendar days of receiving this request to the U.S. Environmental Protection Agency, Attention: Walt Francis, 77 West Jackson Boulevard, Mail Code: LR-8J, Chicago, Illinois 60604.

USCG Detroit may assert a business confidentiality claim under 40 C.F.R. part 2, subpart B for all or any part of the information it submits to EPA. EPA will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. part 2, subpart B. USCG Detroit must make any request for confidentiality in the manner described in 40 C.F.R. § 2.203(b) when it submits the information. If USCG Detroit does not assert a business confidentiality claim when it submits the information, EPA, may make this information available to the public without further notice.

USCG Detroit must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should

notify EPA. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. EPA may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. §§ 3501 – 3520, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. Failure to comply fully with this request for information may subject USCG Detroit to enforcement action under section 3008 of RCRA, 42 U.S.C. § 6928. You should direct questions about this request for information to Walt Francis at (312) 353-4921.

Sincerely,



Julie Morris, Chief  
Compliance Section 2  
RCRA Branch  
Land and Chemicals Division

cc: John Craig, MDEQ  
([craigj@michigan.gov](mailto:craigj@michigan.gov))  
Lonnie Lee, MDEQ  
([leel@michigan.gov](mailto:leel@michigan.gov))

## ATTACHMENT 1

### **Instructions**

USCG Detroit must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. Where used below, "USCG Detroit Facility" refers to the USCG Detroit facility located at 110 Mount Elliott Street, Detroit, Michigan. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds. If you have provided responsive information in a previous response to an information request which USCG Detroit submitted to EPA, you do not need to resubmit that information – rather, indicate in USCG Detroit's response to this information request the date the information was previously provided to EPA.

### **Background**

On May 24, 2016, representatives of EPA and the Michigan Department of Environmental Quality (MDEQ) inspected the USCG Detroit facility. During the inspection, the inspectors reviewed waste manifests and shipping papers. The only hazardous wastes listed in these shipments were 100 pounds of crushed spent fluorescent bulbs and a bulb crusher machine. According to USCG Detroit personnel, any wastes generated by contractors that occasionally work at the facility, including blasting and painting of vessels, were not evaluated by USCG Detroit personnel to determine if they were hazardous wastes, and any hazardous wastes generated by these contractors were not included in the quantities of hazardous wastes generated by the facility to determine the USCG Detroit's proper generator classification each month.

### **Requests**

1. Provide a list of the contractors performing blasting, painting or repair work of vessels at the Detroit facility for the past two years.
2. Provide a list of all wastes (non-hazardous and hazardous) that contractors have generated at the Detroit facility for the past two years. Also, include copies of any hazardous waste manifests or bills of lading for the corresponding off-site shipments of the wastes by contractors from the Detroit Facility for the past two years. Please include any hazardous waste manifests where the contractor was utilizing a separate EPA ID number for the hazardous waste from the Detroit facility.
3. Provide any waste determination information on the wastes that were generated by contractors at the Detroit facility for the past two years.
4. During the May 24, 2016 inspection, the inspectors reviewed hazardous waste manifest information from the Detroit facility. Specifically, crushed fluorescent bulbs were shipped off-site as a mercury bearing D009 hazardous waste.

- a. Provide the dates when the bulb crusher was placed into operation and taken out of service;
  - b. A permit to install (PTI) is required to install, construct, reconstruct, relocate, or modify any process or process equipment, including control equipment pertaining thereto, which may emit an air contaminant, MAC R 336.1201. According to MDEQ, when a company chooses to crush their spent lights for recycling, it must apply for and obtain a PTI prior to installing and operating a bulb crusher. Please provide a copy of the PTI for the USCG Detroit bulb crushing unit.
5. During the May 24, 2016 inspection, the inspectors observed a storage container on the "Working Pier" that was labeled "Used Oil." Please provide a copy of the most recent manifest for the out-going used oil from the Detroit facility.
6. Provide the following certification by a responsible corporate officer or by a general partner or the proprietor:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.